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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

UNITED STATES OF AMERICA,)	
Plaintiff,)	CASE NO. 2:19-CR-000222-KJD-BNW
vs.)	
LANCE K. BRADFORD,)	
Defendant,)	

**STIPULATION AND ORDER TO ALLOW DEFENDANT BRADFORD
TO OBTAIN A PASSPORT AND TRAVEL**

IT IS HEREBY STIPULATED and AGREED by and between the United States of America, by and through NICHOLAS TRUTANICH, United States Attorney, and STEVEN W. MYHRE, Assistant United States Attorney, and Defendant LANCE K. BRADFORD, by and through his counsel, RUSSELL E. MARSH, ESQUIRE, that the conditions of Mr. Bradford's Pretrial Release be modified to allow him to obtain his passport and travel to Mexico for up to one week in June 2020.

1. On September 3, 2019, Mr. Bradford appeared pursuant to a Summons, and was released on a PR Bond (ECF No.7). Mr. Bradford was ordered to surrender his passport and his travel was restricted to the continental U.S. unless approved by Pretrial Services (*Id.* at 3).

2, Mr. Bradford's trial in this matter is currently set for November 16, 2020. (ECF No. 17).

1 3. Mr. Bradford would like to travel to Mexico for business purposes during June 2020.
2 He currently plans to travel with a business associate from June 18-22, 2020. He will need to
3 retrieve his passport to travel out of the United States.

4 4. The parties agree that the conditions of Mr. Bradford's pretrial release be modified
5 to allow him to obtain his passport and travel. Mr. Bradford is currently scheduled to travel from
6 June 18-22, 2020. Mr. Bradford requests access to his passport for those dates. He will return the
7 passport to U.S. Pretrial Services when he returns to the United States.

8 5. Pretrial Services agrees with these changes in Mr. Bradford's conditions of release.
9 Mr. Bradford's Pretrial Services Officer Jessie Moorehead has reviewed and does not oppose this
10 stipulation and Order. Pretrial Services approves the proposed travel.

11 6. The parties agree that all other conditions of Mr. Bradford's release will remain in
12 full force and effect.

13 Dated this 11th day of June, 2020.

14
15 WRIGHT MARSH & LEVY

Respectfully submitted,

NICHOLAS TRUTANICH
UNITED STATES ATTORNEY

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17 BY /s/ Russell E. Marsh
18 RUSSELL E. MARSH
Attorneys for Defendant Bradford

BY /s/ Steven W. Myhre
STEVEN W. MYHRE
Assistant U.S. Attorney

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

UNITED STATES OF AMERICA,
Plaintiff,
vs.
LANCE K. BRADFORD,
Defendant,

CASE NO. 2:19-CR-000222-KJD-BNW

ORDER

Based on the Stipulation between the Defendant, Lance K. Bradford, and the Government, through counsel, and good cause appearing,

IT IS HEREBY ORDERED that the conditions of Defendant Bradford's pretrial release be modified as follows:

1. Mr. Bradford may travel to Mexico for up to one week in June 2020.
2. Mr. Bradford will obtain his passport from U.S. Pretrial Services within one week prior to his travel. U.S. Pretrial Services will provide the passport to him for the purpose of this travel. Mr. Bradford will provide his passport to Pretrial Services within two business days of his return to the United States.
3. All other conditions of Pretrial Supervision remain in effect.

IT IS SO ORDERED.

Dated: June 11, 2020.


ELAYNA J. YOUCHAK
UNITED STATES MAGISTRATE JUDGE